

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

DAVID BEAULIEU)
_____)

CRIM. NO. 04-10358-GAO

MOTION FOR THE APPOINTMENT OF INTERIM COUNSEL

The defendant, David Beaulieu, hereby moves this Honorable Court to appoint interim counsel to represent the defendant while the undersigned counsel is on maternity leave, from September 15 through the end of 2006 or earlier if counsel returns earlier. The defendant states the following grounds for this motion:

1. The undersigned counsel for the defendant will be on maternity leave starting on September 15, anticipating a return to work in mid-late December.
2. Charlie Rankin, Chair of the C.J.A. Panel, has asked the undersigned counsel to file this motion to have interim counsel appointed to represent the defendant while the undersigned counsel is on leave.

WHEREFORE, the defendant respectfully requests this Honorable Court to appoint interim counsel to represent David Beaulieu during the period of counsel's leave.

Respectfully submitted,

DAVID BEAULIEU
By his Attorney,
/s/ Leslie Feldman-Rumpler
Leslie Feldman-Rumpler
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